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2-13-2008

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, D.C. 20554

RE: EB Docket No. 06-36
Annual CPNI Certification for Year 2007

Dear Ms. Dortch:

In accordance with Public Notice DA 08-171, issued on January 29, 2008, attached is the annual CPNI certification filing for the year of 2007 for Spencer Municipal Utilities.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Rezabek", is written over a horizontal line.

Jeffrey Rezabek

Attachment

cc: Federal Communications Commission (*two copies*)
Enforcement Bureau
Telecommunications Consumers Division
445 12th Street, SW
Washington, D.C. 20554

Best Copy and Printing, Inc. (*one copy*)
445 12th Street
Suite CY-B402
Washington, D.C. 20554

No. of Copies made 044
List ABOVE

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2007

Date filed: February 13, 2008

Name of company covered by this certification: Spencer Municipal Utilities

Form 499 Filer ID: 820746

Name of signatory: Jeffrey Rezabek

Title of signatory: Telecom Manager

I, Jeffrey Rezabek certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

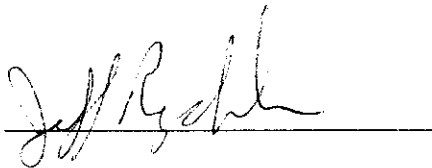
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

If affirmative:

Signed



ATTACHMENT

OPERATING PROCEDURES FOR COMPLIANCE WITH CPNI RULES

Spencer Municipal Utilities (the "Company") has implemented the following procedures to ensure that it is compliant with Part 64 of Title 47 of the Code of Federal Regulations, Subpart U – Customer Proprietary Network Information (CPNI), § 64.2001 through § 64.2011.

Compliance Officer

The Company has appointed a CPNI Compliance Officer. The Compliance Officer is responsible for ensuring that the Company is in compliance with all of the CPNI rules. The Compliance Officer is also the point of contact for anyone (internally or externally) with questions about CPNI.

Employee Training:

The Compliance Officer arranges for the training of all employees on an annual basis, and more frequently as needed. Any new employee is trained when hired by the Company. The training includes, but is not limited to, when employees are and are not authorized to use CPNI, and the authentication methods the company is using. The detail of the training can differ based on whether or not the employee has access to CPNI.

After the training, all employees are required to sign a certification that they have received training on the CPNI rules, that they understand the Company's procedures for protecting CPNI and they understand the Company's disciplinary process for improper use of CPNI. Training includes notice to employees that the CPNI manual is housed in the Compliance Officer's office.

Employees are instructed that if they ever have any questions regarding the use of CPNI, or if they are aware of CPNI being used improperly by anyone, they should contact the Compliance Officer immediately.

Disciplinary Process

The Company has established a specific disciplinary process for improper use of CPNI. The disciplinary action is based on the type and severity of the violation and could include any or a combination of the following: retraining the employee on CPNI rules, notation in the employee's personnel file, formal written reprimand, suspension or termination.

The disciplinary process is reviewed with all employees.

The Company's disciplinary process is part of the employee personnel policy. Employees have access to this policy on the company network.

Customer Notification and Request for Approval to Use CPNI

The Company has provided notification to its customers of their CPNI rights and has asked for the customer's approval to use CPNI via the opt-out method. A copy of the notification is also provided to all new customers that sign up for service.

The status of a customer's CPNI approval is prominently displayed as soon as the customer's account is accessed so that employees can readily identify customers that have restricted the use of their CPNI.

For the customers that have opted-out and said the Company cannot use their CPNI, that decision will remain valid until the customer changes it.

Notification of Breaches

Employees will immediately notify the Compliance Officer of any indication of a breach. If it is determined that a breach has occurred, the Compliance Officer will do the following:

- Notify the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI) as soon as practicable, but in no event later than 7 business days after determination of the breach. The notification will be via the FCC link at <http://www.fcc.gov/eb/cpni>.
- Notify customers only after 7 full business days have passed since notification to the USSS and the FBI, unless the USSS or FBI has requested an extension.
- If there is an urgent need to notify affected customers or the public sooner to avoid immediate and irreparable harm, it will be done only after consultation with the relevant investigating agency.
- Maintain a record of the breach, the notifications made to the USSS and FBI, and the notifications made to customers. The record should include dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach.
- Include a summary of the breach in the annual compliance certificate filed with the FCC.

Annual Certification

The Compliance Officer will file a Compliance Certification with the FCC by March 1 of each year, for data pertaining to the previous calendar year.

Record Retention

The Company retains all information regarding CPNI. Following is the minimum retention period we have established for specific items:

- CPNI notification and records of approval – one year. Stored in customer files.
- Marketing campaigns – one year. Stored in CPNI official files.
- Breaches – two years. Stored in CPNI official files.
- Annual certification – five years. Stored in CPNI official files.
- Employee training certification – two years. Stored in CPNI official files.
- All other information – two years. Stored in CPNI official files.